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Before the
Federal Communications Commission
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the Matter of

Children's Television Obligations
of Digital Television Broadcasters

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) MM Docket No. 00-167 /
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**JOINT COMMENTS OF THE ASSOCIATION OF AMERICA'S PUBLIC TELEVISION
STATIONS AND THE PUBLIC BROADCASTING SERVICE**

The Association of America's Public Television Stations ("APTS") and the Public Broadcasting Service ("PBS"), (collectively referred to as "Public Television") hereby submit these comments on the Commission's Notice of Proposed Rulemaking in the above-captioned proceeding.¹ In its Notice, the Commission seeks comments on how its existing children's television obligations, based on analog television technology, should be adapted to apply to digital broadcasting.

APTS is a nonprofit organization whose members comprise the licensees of nearly all of the nation's 353 noncommercial educational television stations. APTS represents public television stations in legislative and policy matters before the Commission, Congress, and the Executive Branch and engages in planning and research activities on behalf of its members. PBS is a nonprofit membership organization composed of the licensees of the nation's public television stations. PBS distributes national public television programming and provides other program-related services to noncommercial television stations.

¹ Children's Television Obligations of Digital Television Broadcasters, Notice of Proposed Rulemaking, FCC 00-344, MM Docket No. 00-167 (October 5, 2000) ("NPRM").

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In response to the Commission's proposals in this proceeding, public television raises the following issues of importance to noncommercial television stations. First, in light of its exemplary track record of providing quality educational programming for children, public television requests its continued exemption from children's television reporting and public disclosure requirements in the digital world. Second, public television generally supports proposals that would encourage funding arrangements with commercial broadcasters if such arrangements (a) are structured to ensure adequate funding and sufficient distribution of quality, noncommercial educational children's programming and services; (b) are directed toward national, regional or local noncommercial television entities that have demonstrated a commitment to high quality children's noncommercial educational programming; and (c) are designed to encourage innovation and responsiveness to local community needs. Lastly, public television seeks clarification that any change to the definition of "commercial matter" for purposes of children's programming should not interfere with the legitimate ability of public television stations to air promotional programming for non-profits, as authorized by statute and the Commission's rules.

I. Public Television's Proven Success in Providing Quality Children's Educational Programming and Local Outreach Services Justify Continuing its Exemptions from Reporting and Public Disclosure Requirements

A. Public Television Provides Quality Children's Educational Programming and Local Outreach Services

Consistent with its statutory mission to serve the educational needs of children,² public television's commitment to quality children's educational television programming is second to none. Indeed, throughout the nation, children, parents and teachers regularly turn to public television for quality educational content that is age appropriate, nonviolent, and engaging.

² See 47 U.S.C. § 396(a)(6).

Programs like *Sesame Street*, *Mr. Rogers' Neighborhood*, *Barney and Friends*, *Zoom*, *Arthur*, *Clifford the Big Red Dog*, *Dragon Tales* and *Zoboomafoo*, to name just a few examples, contribute to a stellar schedule of educational children's programming on public television. In its 1999 survey of children's television, the Annenberg Public Policy Center of the University of Pennsylvania found that public television presented the highest quality and most educational of programs directed toward children and that children's programming on public television had no violence, no problematic language, and the most ethnic and gender diversity of characters.³ In fact, over the past five years, public television programs have earned far more daytime Emmy's for children's programming than any commercial broadcast or cable network.

1. *Ready to Learn* Programming and Extended Services

One particularly compelling example of public television's commitment to quality children's educational programming is the PBS *Ready to Learn* initiative. Funded by a grant from the Department of Education, *Ready to Learn* combines comprehensive and coordinated national programming with local outreach activities designed to ensure school readiness and success for children ages 2-6. For instance, the *Ready to Learn* program, *Between the Lions*, has been very successful in using television to help children learn to read. The producers of *Between the Lions* enlisted a group of respected literacy experts to help develop the series by using a highly effective curriculum and methodology. One early research study has demonstrated the effectiveness of this approach, finding that exposure to just four weeks of the series helped

³ In addition, the UCLA's television violence studies in 1995, 1996 and 1997 consistently found that public television programs are virtually free of violence, and the National Television Violence Study released in February of 1996 determined that programs with violence elements are presented least often on public television. For references to these studies, see www.pbs.org/insidepbs/facts/faq4.html.

kindergarten students to improve their reading skills significantly, as compared to similar students who did not watch the program.⁴

However, the full impact of children's programming on public television extends beyond the screen, with a full panoply of coordinated outreach services to local communities. For instance, to extend the educational impact of PBS Ready to Learn programs directly into local communities, the Ready to Learn public television stations:

- Conduct training workshops to help parents, teachers, and caregivers use television as a positive force in children's lives through music, art, reading and discussion.
- Collaborate with local partner organizations like Head Start, Even Start, PTA, libraries and museums, and national organizations like Sesame Street Preschool Education Program (PEP) and Mister Rogers' Neighborhood Child Care Partnership.
- Distribute program users' guides, activity sheets and media literacy information to complement programming.
- Participate in the "First Book" program, which distributes free books to disadvantaged children and volunteer staff time to read to children in local communities.
- Distribute PBS Families, a newsletter in English and Spanish that provides advice to caregivers and suggests program-related activities for children.

Currently, 130 public television stations, reaching 90 percent of American families, participate in *Ready to Learn*. Over the past four years, public television stations have trained 560,000 parents and caregivers, reaching over 5.25 million children. The following are two particularly compelling examples how the *Ready to Learn* outreach programs have had an effect on local communities.

- In partnership with the Dell Foundation and the Texas State Library, KLRU in Austin, Texas, conducts a four-part learning workshop for parents from low-income households to help them be actively involved in their children's education. Half of

⁴ Deborah L. Linebarger, PhD., "Summative Evaluation of Between the Lions," Juniper Gardens Children's Project, University of Kansas (June 29, 2000).

those served by these *Ready to Learn* workshops speak English as a second language. By the end of the workshop's first year, nearly 7,000 children had participated, in addition to approximately 530 parents and 130 teachers.

- In partnership with the Tennessee Department of Human Services, WJLT in Martin, Tennessee airs the successful "Whole Child" program, which provides guidelines on working with children in daycare centers. Prospective childcare providers and educators can tape the broadcast and watch it at home to earn credit toward requirements to become a childcare provider. Part of the station's *Ready to Learn* programming, the program reaches an average of 20,000 people daily.

2. Public Television Stations' Local Programming and Related Outreach Services

In addition to the *Ready to Learn* initiatives, local public television stations offer additional local programming and outreach to serve the educational needs of children in their communities. For instance, *KidScience*, a program produced by KHET, Honolulu, is a series aimed at middle-school children that explores a variety of scientific and technological topics, including space exploration and ocean ecology. KCPT in Kansas City, Missouri, has created *Read Aloud with Wally Amos*, a series of enhanced television programs that are designed to improve literacy through a well-researched and constructed curriculum based on recent, groundbreaking research findings on brain development in young children.

Complementing their locally-produced educational programming, local public television stations have also engaged in numerous outreach initiatives within their communities to serve the educational needs of children. For instance, WNED in Buffalo, New York sponsors the "Kidsvention" every autumn, in which students in grades 7-12 from 40 schools form debate teams and are given assigned topics on issues of public importance prior to the fall elections. WITF in Harrisburg, Pennsylvania has regularly sponsored an event called Literacy to Stage, where parents and children from pre-school to 8th grade come together to have stories read aloud and performed by actors on stage in order to promote literacy and arts appreciation. In addition, on June 5, 1999, public television stations serving more than 1,000 communities nationwide,

sponsored Safe Night USA in association with Wisconsin Public Television, a program in which youth and teens were given the opportunity to learn conflict resolution skills in a relaxed atmosphere free of violence and drugs.

Moreover, because teachers place a considerable amount of trust in its proven programs, public television is the number one resource for instructional classroom programming and teacher training, serving 30 million students and 63,000 schools.⁵ The examples of instructional video provided to schools and libraries are numerous indeed. However, one particularly innovative program is Chalkwaves, a collaborative partnership spearheaded by KCPT (Kansas City, MO), with public television stations and local school districts. Chalkwaves is a multi-faceted technology and service organization delivering three distinct categories of products: digitally-streamed standards-based instructional television video; online complementary multimedia resources; and virtual and onsite professional development. Chalkwaves is currently used by 30,000 teachers in 342 districts serving 350,000 K-12 students in Kansas, Missouri and Illinois.⁶

3. Public Television's Commitment to Serving Children's Educational Needs Through Digital Services

Public television's commitment to quality children's television programming is greatly enhanced by digital technology and its interactive capabilities. For instance, nearly every public television station has plans to multicast at least one channel devoted to children's educational programming. This may be the newly developed 24-hour national children's channel, called *PBS Kids*, or a channel of local educational services. In addition, public television stations have banded together to create exciting regional educational services for children that employ digital

⁵ Comments of the Association of America's Public Television Stations, Public Interest Obligations of PTV Broadcast Licensees, MM Docket No. 99-360 (March 27, 2000), 10.

⁶ For further information, see www.chalkwaves.org.

technology. One example is a collaborative partnership among public television stations in Florida called the Florida Knowledge Network, which is a teacher training resource to be delivered directly into the state's classrooms. This service will provide educators with direct access to the highest quality programming, electronic field trips and distance learning. Linked with the state Department of Education and school systems in 17 counties, the network will tailor programming schedules and curriculum for localized use. In addition, datacasting will allow teachers to download lesson plans and educational materials.

Moreover, the digital revolution in children's education also encompasses the creative and intensive use of websites rich with digital content, such as PBS Online at PBS.org and the websites of local public television stations. The following are some examples of how local public television stations are using the Internet to enhance children's education.

- Providence station WSBE's Internet resource pages have been a highly successful education tool for Rhode Island area students in grades K-12. Offering education-related resources in 32 curriculum areas, the Internet pages have 882 links to resources that are frequently used by educators, parents and students.
- KEET in Eureka, California is using the Internet to address school violence. Its On-Line Special offers solutions to school violence by using live interaction with a teen panel over the Internet.
- WNET, New York has developed NetSchool, a free, online service featuring everything from standards-based lesson plans and classroom activities to a multimedia primer, online mentors and reviews of curriculum-based websites.

Therefore, in accordance with its statutory mission, public television continues to serve the educational needs of children through quality television programming and local services in both the traditional analog and newly emerging digital media.

B. Public Television's Exemptions from Children's Reporting and Public Disclosure Requirements Should Continue

The Children's Television Act of 1990⁷ required the Commission, in its review of each television broadcast license renewal application, to consider the extent to which the licensee has "served the educational and informational needs of children through the licensee's overall programming, including programming specifically designed to serve such needs."⁸ In response, the Commission adopted rules requiring, as part of the license renewal process, that broadcast stations must provide at least three hours per week of "core" educational programming, specifically designed to serve the educational and informational needs of children.⁹ In addition, any special non-broadcast efforts to enhance the value of children's educational and informational programming, as well as any special effort to produce or support such programming of another station in the licensee's marketplace, may also contribute to the licensee's meeting its obligations under this guideline.¹⁰

The Commission also adopted rules requiring commercial television stations to identify core educational programs at the beginning of the program (such as with a verbal announcement or an icon), and to provide information identifying these programs to publishers of program

⁷ Children's Television Act of 1990, Pub. L. No. 101-437, 104 Stat. 996-1000, codified at 47 U.S.C. §§ 303a, 303b, 394.

⁸ 47 U.S.C. § 303b(a). The CTA also directs the FCC to create rules prescribing standards applicable to commercial broadcasters that limit the amount of advertising allowed in conjunction with children's television programming. See 47 U.S.C. § 303a. Although commercial stations must demonstrate at renewal time how they complied with the limits on commercial advertising, noncommercial stations are exempt from this requirement because of the general prohibition against the broadcast of advertisements. See In the Matter of Policies and Rules Concerning Children's Television Programming; Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations, Report & Order, FCC 91-113, 6 FCC Rcd 2111 ¶ 30 (April 12, 1991), *recon. granted in part*, FCC 91-248, 6 FCC Rcd 5093 ¶¶ 43-45 (August 1, 1991).

⁹ See 47 C.F.R. § 73.671(a) and Note 2. Such programming must have serving the educational and informational needs of children (16 years and under) as a significant purpose; be aired between the hours of 7 a.m. and 10 p.m.; be a regularly scheduled weekly program; and be at least 30 minutes in length. See 47 C.F.R. § 73.671(c).

¹⁰ 47 U.S.C. § 303b(b) and 47 C.F.R. § 73.671(b).

guides and TV listings.¹¹ Additionally, the Commission rules require commercial TV stations to complete quarterly reports regarding their educational programming and to make these reports available to the public.¹²

However, recognizing that public television has an exemplary track record in providing educational children's programming and non-broadcast services directed toward children's education, and acknowledging the Congressional intent to relieve public television stations of burdensome regulations, in 1996 the FCC exempted noncommercial stations from the reporting and public identification requirements. The Commission stated:

We will continue to exempt noncommercial television licensees from children's programming reporting requirements, ... and we will also exempt them from the other public information initiatives In light of Congressional intent to avoid unnecessary constraints on broadcasters, and in view of the commitment demonstrated by noncommercial stations in general to serving children, we believe it is inappropriate to impose reporting obligations on such stations.¹³

In light of public television's continuing commitment to quality educational children's programming in both analog and digital formats, and in view of public television's extensive non-broadcast outreach initiatives designed to enhance the education of children, public television urges the Commission to continue, in digital operations, the reporting and identification exemptions that currently exist for its analog operations.

¹¹ 47 C.F.R. § 73.673.

¹² 47 C.F.R. § 73.3526(e)(11)(iii). See also Extension of the Filing Requirement for Children's Television Programming Reports (FCC Form 398), FCC 00-343, MM Docket No. 00-44 (October 5, 2000) (extending the reporting requirements indefinitely and making changes to format of reports).

¹³ Policies and Rules Concerning Children's Television Programming; Revision of Programming Policies for Television Broadcast Stations, Report & Order, FCC 96-335, 11 FCC Rcd 10660, n.119 (August 8, 1996). Noncommercial stations are, however, encouraged to comply voluntarily with the reporting requirements to better inform the public. *Id.* ("We nonetheless encourage noncommercial stations voluntarily to comport with these initiatives to the extent feasible as a means of providing parents and other members of the public with additional information about the availability of children's educational and informational programming on all broadcast stations.").

II. Public Television Generally Supports Funding Arrangements with Commercial Broadcasters for the Production and Distribution of Children's Programming

Public television generally supports proposals that would encourage funding arrangements with commercial broadcasters if such arrangements (a) are structured to ensure adequate funding and sufficient distribution of quality, noncommercial educational children's programming and services; (b) are directed toward national, regional or local noncommercial television entities that have demonstrated a commitment to high quality children's noncommercial educational programming; and (c) are designed to encourage innovation and responsiveness to local community needs. The Commission has highlighted two such proposals, both of which argue for the continuation of the three hour "core" requirement, coupled with additional programming obligations for DTV broadcasters that can be satisfied through a "play or pay" system.¹⁴

For instance the Commission has noted Children Now's position that DTV broadcasters should continue to be required to broadcast at least three hours of children's educational programming, but that additional hours of children's educational programming should be required in proportion to the number of hours that a station multicasts.¹⁵ To satisfy this additional programming obligation, Children Now states that commercial broadcasters should have the option to either air their own programming or to pay other networks or channels to air these programs for them. In particular, Children Now suggests that partnerships between commercial and noncommercial broadcasters could "provide much needed support to public broadcasters

¹⁴ These proposals were raised in response to the Commission's Notice of Inquiry, Public Interest Obligations of TV Broadcast Licensees, MM Docket No. 99-360, 14 FCC Rcd 21633 (1999). The Commission is addressing these sponsorship proposals in the instant rulemaking.

¹⁵ NPRM, ¶ 20.

who have a strong commitment to core programming.”¹⁶ The Commission has also noted Children Now’s concern that such arrangements should be structured to ensure the widespread distribution of children’s educational programming and to ensure that enough funding is generated to support the production of high quality children’s programming.¹⁷

The Commission has also highlighted a second proposal made by the Center for Media Education.¹⁸ Like Children Now, the Center for Media Education supports the continuation of the three-hour programming rule on a station’s primary DTV channel and also asks for additional obligations to be imposed on DTV broadcasters that would serve the needs of children. To satisfy these additional obligations, a DTV broadcaster could have the option of choosing from among a menu of activities. Stations may, for instance, (a) air additional educational and informational programming specifically designed for children; (b) provide multi-casting and/or broadband or datacasting services to schools, libraries and community centers; or (c) support funding for the production of children’s educational programming by local public broadcasting stations and other noncommercial educational program producers.¹⁹

In its Notice, the Commission recognized that its rules allow commercial broadcasters to succeed in meeting their children’s educational programming obligations, under certain conditions, by sponsoring core programming to be aired on another station in the same market. The Commission’s rules provide that licensees that do not meet the staff processing guidelines on core programming will have their renewal applications referred to the full Commission where

¹⁶ NPRM, ¶ 20. See also Comments of Children Now, MM Docket No. 99-360 (March 27, 2000), pp. 36-39.

¹⁷ NPRM, ¶ 20.

¹⁸ NPRM, ¶ 21.

¹⁹ See Comments of Center for Media Education, et al, MM Docket No. 99-360 (March 27, 2000), pp. 4-11.

the licensee can demonstrate compliance despite the shortage of core programming by, inter alia, evidence of sponsorship of programming on other stations in the market.²⁰

Because the production and distribution of quality children's educational programming is quite costly, public television welcomes proposals that would enhance the production and distribution of children's educational programming. However, public television urges that any Commission rules adopted regarding these arrangements in the digital world adhere to the following principles.

First, any funding arrangement must ensure that sufficient funding is amassed to result in either an increase of the production of new high quality children's educational programming and related services or an increase in the national or regional distribution of existing children's programming. For instance, in order to satisfy their additional children's programming obligations, commercial DTV broadcasters may be allowed to pay into a national and/or regional fund used to develop and distribute children's educational programming to noncommercial television stations. These funding arrangements should be structured to result in an increase in production of children's programming and services or an increase in the distribution of children's educational programming that already exists but that needs wider dissemination.

Second, commercial funding should be directed toward national, regional or local noncommercial television entities that have demonstrated a commitment to high quality children's noncommercial educational programming. This will ensure editorial quality control

²⁰ NPRM, ¶ 20, citing 47 C.F.R. § 73.671, Note 2. "Licensees that do not meet these processing guidelines will be referred to the Commission, where they will have full opportunity to demonstrate compliance with the CTA (e.g., by relying in part on sponsorship of core educational/ informational programs on other stations in the market that increases the amount of core educational and informational programming on the station airing the sponsored program and/or on special nonbroadcast efforts which enhance the value of children's educational and informational television programming.)" 47 C.F.R. § 73.671, Note 2.

over the content and that these funds will be used to meet the educational needs of children in their local communities.

Third, any funding arrangement should encourage innovation and responsiveness to local community needs. These funding arrangements should recognize that the needs of children vary among localities and allow for local customization by noncommercial stations to address special populations and interests, such as programs that serve populations whose first language is not English or populations interested in home schooling.

Therefore, whatever sponsorship proposal the Commission favors, the Commission should keep these structural principles in mind. These principles are designed to ensure adequate funding and sufficient distribution of quality children's educational programming in order to best serve the educational needs of children in a way that is sensitive to the local needs of their communities.

III. Any Changes to the Definition of "Commercial Matter" Should Not Affect the Ability of Public Television Stations to Support Non-profit Entities

The Commission limits the amount of time per hour during which "commercial matter" may be broadcast during children's programming to 10.5 minutes per hour on weekends and 12 minutes per hour on weekdays.²¹ Noncommercial stations are exempt from this requirement because they are generally prohibited from broadcasting advertisements.²² The Commission has noted that "commercial matter" is defined to exclude certain types of program interruptions,

²¹ See 47 U.S.C. §§ 303a(b), 303b and NPRM, ¶¶ 5, 33.

²² See In the Matter of Policies and Rules Concerning Children's Television Programming; Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations, Report & Order, FCC 91-113, 6 FCC Rcd 2111 ¶ 30 (April 12, 1991), *recon. granted in part*, FCC 91-248, 6 FCC Rcd 5093 ¶¶ 43-45 (August 1, 1991).

including: (a) promotions of upcoming programs that do not contain sponsor-related mentions; (b) public service messages promoting not-for-profit activities; and (c) airtime sold for purposes of presenting educational and informational material.²³ Because the Commission has noticed that a significant amount of time is devoted to these types of announcements in children's programming, it is seeking comment on whether it should change the definition of "commercial matter" for the purposes of the children's programming policy, to eliminate some or all of the exemptions.²⁴

If the Commission were to change the definition of "commercial matter" for purposes of children's programming, public television urges the Commission to be sure that these changes do not unintentionally interfere with the legitimate ability of public television stations to air promotional programming for non-profit entities, as currently allowed by statute and Commission regulations. Although Section 399B of the Communications Act forbids public television stations from broadcasting advertisements,²⁵ the same statute defines "advertisement" to mean "any message or other programming material which is broadcast or otherwise transmitted in exchange for remuneration, and which is intended (1) to promote any service, facility, or product offered by any person who is engaged in such offering for profit...."²⁶ The statute makes clear that where promotional material does not fit the definition of "advertisement," public television stations "shall be authorized to engage in the offering of

²³ NPRM ¶ 33, citing In the Matter of Policies and Rules Concerning Children's Television Programming; Revision of Programming and Commercialization Policies, Ascertainment Requirements, and Program Log Requirements for Commercial Television Stations, Report & Order, FCC 91-113, 6 FCC Rcd 2111, 2112 (April 12, 1991).

²⁴ NPRM, ¶¶ 33-34.

²⁵ 47 U.S.C. § 399B(b)(2).

²⁶ 47 U.S.C. § 399B(a)(emphasis supplied).

services, facilities, or products in exchange for remuneration.”²⁷ The Commission has interpreted this to mean that public television stations may air promotional material in exchange for remuneration on behalf of nonprofit organizations, because such activity does not constitute an advertisement.²⁸

Public television is therefore concerned that by narrowing the definition of “commercial matter” to exclude promotional programming on behalf of non-profits within the context of children’s programming the Commission may be unintentionally interfering with the legitimate ability of public television stations to serve their community through the broadcast of promotional material on behalf of nonprofit organizations. Public television urges the Commission to make it clear that any narrowing of the definition of “commercial matter” does not affect its existing interpretation of the definition of “advertisement” as it applies to public broadcasters.

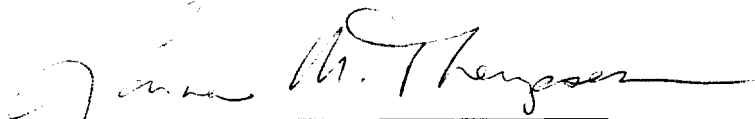
²⁷ 47 U.S.C. ¶ 399B(b)(1).

²⁸ “[P]romotional announcements on behalf of nonprofit organizations (including their services, facilities, or products), do not qualify as “advertisements” and are generally not prohibited.” Chicago Educational Television Association, Licensee Station WTTW(TV), Letter, DA 95-2116, 10 FCC Rcd 12018, 1 Com. Reg. (P&F) 1110 (October 31, 1995).

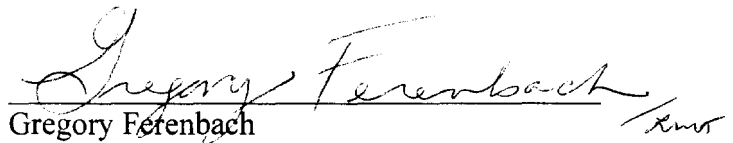
Conclusion

Public television urges the Commission to support the continued exemption from children's television reporting and disclosure requirements. Public television generally supports proposals that would encourage funding arrangements with commercial broadcasters if such arrangements (a) are structured to ensure adequate funding and sufficient distribution of quality, noncommercial educational children's programming and services; (b) are directed toward national, regional or local noncommercial television entities that have demonstrated a commitment to high quality children's noncommercial educational programming; and (c) are designed to encourage innovation and responsiveness to local community needs. Lastly, public television seeks clarification that any change to the definition of "commercial matter" for purposes of children's programming should not interfere with the legitimate ability of public television stations to air promotional programming for non-profits, as authorized by statute and the Commission's rules.

Respectfully submitted,

A handwritten signature in dark ink, appearing to read "Marilyn M. Thompson" or similar, written over a horizontal line.

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December 18, 2000